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July 10, 2023

Via ECF

United States District Court
Eastern District of New York
Honorable Sanket J. Bulsara
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Fidan, et al. v. Istanbul Rego Park Inc., et al.*
Case No. 22-CV-2252 (ENV) (SJB)
Status Letter

Dear Judge Bulsara:

Our office represents Plaintiffs Ali Fidan and Ece Karagoz (collectively, “Plaintiffs”) in the above-referenced matter. In advance of the Status Conference scheduled for Wednesday, July 12, 2023 at 2:00 p.m., we write to advise the Court of the current status of discovery.¹ Defendants have provided documents in response to Plaintiff’s document requests; however, Defendants have not formally responded to Plaintiff’s interrogatories or Plaintiff’s document demands. Depositions also remain outstanding.

As such, we respectfully request a 60-day extension of the fact discovery deadline from August 4, 2023 to October 4, 2023 to complete all remaining discovery. This is the parties’ second request for an extension.

We thank the Court for its attention to this matter.

Respectfully submitted,

Akin & Salaman

/s/ Robert D. Salaman
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Attorneys for Plaintiffs

cc: Emanuel Kataev (via ECF)
Attorneys for Defendants

¹ We reached out to Defendants’ counsel in advance of filing this letter but have not heard back.